

**IN THE UNITED STATES DISTRICT COURT FOR THE  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

JOHNNY M. HUNT, )  
Plaintiff, )  
vs. )  
SOUTHERN BAPTIST CONVENTION; )  
GUIDEPOST SOLUTIONS LLC; and )  
EXECUTIVE COMMITTEE OF THE )  
SOUTHERN BAPTIST CONVENTION, )  
Defendants. )

Case No. 3:23-cv-00243  
Judge Campbell  
Magistrate Judge Frensley  
Jury Demand

## **MOTION TO COMPEL FORENSIC COLLECTION**

Plaintiff Johnny M. Hunt, by and through the undersigned counsel, respectfully moves this Court to compel Defendant Guidepost Solutions LLC (“Guidepost”) to forensically collect text messages from the phones of Julie Myers Wood, Krista Tongring, Samantha Kilpatrick, and Russell Holske.

As explained in the accompanying Memorandum, Plaintiff has proof that text messages have been destroyed or lost, and Guidepost failed to comply with the Court's Order and adequately search the phones of Ms. Myers Wood, Ms. Tongring, Ms. Kilpatrick, and Mr. Holske. Instead, Guidepost delegated the responsibility of searching for relevant text messages to each individual witness, resulting in a limited and deficient production.

For the foregoing reasons, as well as the reasons set forth in the accompanying Memorandum, this Court should grant this Motion.

Dated: May 31, 2024

Respectfully submitted,

s/ Andrew Goldstein

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## **CERTIFICATE OF SERVICE**

I hereby certify that I caused a true and correct copy of the foregoing Motion to Compel Forensic Collection to be electronically filed with the Clerk of the Court on May 31, 2024, using the CM/ECF system, which will automatically serve all counsel of record listed below:

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